

MICHIGAN OPERATIONS
March 13, 2018

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Waste Management & Radiological Protection Division
Michigan Department of Environmental Quality (MDEQ)
P.O. Box 30241
Lansing, MI 48909

cc: Dan Daily, MDEQ-OWMRP, P.O. Box 30241, Lansing, MI 48909
Trisha Confer, MDEQ-OWMRP, 401 Ketchum Street, Suite B, Bay City, MI 48708

RE: THE DOW CHEMICAL COMPANY – MID 000 724 724
MINOR MODIFICATION REQUEST FOR REPLACEMENT OF EXISTING PIEZOMETER

In accordance with R 299.9519(5) of the administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of NREPA, 1994 PA 451, as amended, The Dow Chemical Company (Dow) is requesting approval of a minor modification to the Operating License to replace an existing functional piezometer with a new piezometer and replacement of a soil box with a new box adjustment to the new traffic gate across South Saginaw Road to facilitate a plant expansion project.

Existing piezometer 4363 is included in the facility shallow groundwater hydraulic monitoring program outlined in License Condition IX.E.3. The existing piezometer is located directly in the area where a new soil box SR-A facility that is planned for construction and the existing piezometer and soil box need to be abandoned to accommodate construction of new structure. Prior written approval via a minor modification to the Operating License is required pursuant to Condition IX.B.1.(h) for this change.

The proposed activities associated with this request include: abandonment of existing piezometer 4363 by plugging the casing with neat cement, consistent with the procedures outlined in Appendix K of Attachment 15 of the Operating License; and piezometer 4363 will be replaced in the facility shallow hydraulic groundwater monitoring program with a new piezometer, located at the approximate location identified on the attached figure, approximately two hundred feet to the west of existing piezometer 4363. Soil box SR-A will continue to be sampled until the start of construction. Upon completion of construction, a new soil box will be included adjacent to the existing location, as shown in the attached figure. Upon approval, the Midland Plant Sampling and Analysis Plan will be updated to reflect the new piezometer and soil box information and locations.



If you have any questions regarding this information, please contact Marty Crook at 989-638-9552.

Scott Bemis
EH&S Responsible Care Leader
Environment, Health and Safety
1790 Building, Washington Street
Midland, MI 48674
(989) 636-2646

Enclosures
mdc



Legend

-  Perimeter Soil Box Monitoring Station
-  Fence Line

AECOM

Dow Program

Figure 1
Soil Box Monitoring Stations
The Dow Chemical Company
Michigan Operations

DRAWN: MDC	CHECKED: EP	SCALE: 1" = 1300'
DATE: 8-11-2016	FILE: New Soil Boxes2016-SAP.mxd	

S. Saginaw Rd



Existing Soil Box
SR-A

New Soil Box Location
(Replaces Soil Box SR A)

New Facility Shallow
Well (Replaces 4363)

4363

3654

New Gate
House

1 inch = 100 feet



AECOM
Dow Program

Figure 2
South Saginaw Road
The Dow Chemical Company
Michigan Operations

DRAWN: JLH	CHECKED: MDC	SCALE: As Shown
DATE: 11-7-2016	FILE: New Soil Box location and FSW.mxd	